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10 Attorneys for Plaintiffs

11 UNITED STATES DISTRICT COURT

12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 BOARDS OF TRUSTEES OF THE SHEET  
14 METAL WORKERS LOCAL 104 HEALTH  
15 CARE TRUST, et al.,

16 Plaintiffs,

17 v.

18 JET MECHANICAL, INC., a California  
19 corporation,

20 Defendant.

Case No.: C13-4194 EMC

**PLAINTIFFS' REQUEST TO VACATE  
CASE MANAGEMENT CONFERENCE;  
and [PROPOSED] ORDER THEREON**

Date: January 22, 2015

Time: 10:30 a.m.

Ctrm: Courtroom 5, 17th Floor  
450 Golden Gate Avenue  
San Francisco, California

Judge: The Honorable Edward M. Chen

21 Plaintiffs respectfully request that the Case Management Conference scheduled for  
22 January 22, 2015, at 10:30 a.m., be vacated. Good cause exists, as follows.

23 1. As the Court's records will reflect, this action was filed on September 10, 2013 to  
24 compel Defendant to comply with the terms of its Collective Bargaining Agreement.

25 2. The parties have executed a Judgment Pursuant to Stipulation, which is being filed  
26 by Plaintiffs concurrently with this request. Entry of the Judgment Pursuant to Stipulation is  
27 pending an Order by the Honorable Judge Edward M. Chen.

28 3. There are no issues that need to be addressed by this Court at the currently  
scheduled Case Management Conference. As the parties have resolved this matter, and in the  
interest of conserving costs as well as the Court's time and resources, Plaintiffs respectfully  
request that the Court vacate the currently scheduled Case Management Conference.

1           4.       Plaintiffs recognize that a case management conference statement is due seven days  
2 in advance of the case management conference date, pursuant to Local Rule 16-9. Should this  
3 Court require Plaintiffs to file a complete Case Management Conference Statement, Plaintiffs will  
4 do so promptly.

5  
6 Dated: January 15, 2015

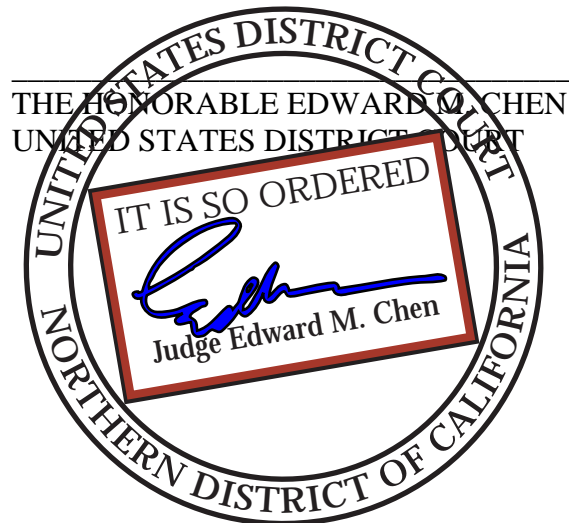
**SALTZMAN & JOHNSON  
LAW CORPORATION**

7  
8 By: \_\_\_\_\_/S/  
9 Michele R. Stafford  
Attorneys for Plaintiffs

10 IT IS SO ORDERED.

11           Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case  
12 Management Conference is hereby VACATED.

13 Date: \_\_\_\_\_ 1/15/15



PROOF OF SERVICE

I, the undersigned, declare:

1. I am a citizen of the United States and am employed in the County of San Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

2. I am over the age of eighteen and not a party to this action.

3. On **January 15, 2015**, I served the following document(s):

**PLAINTIFFS' REQUEST TO VACATE CASE MANAGEMENT CONFERENCE; and  
[PROPOSED] ORDER THEREON**

on the interested parties in said action by enclosing a true and exact copy of each document in a sealed envelope and placing the envelope for collection and First Class mailing following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

4. The envelopes were addressed and mailed as follows:

**Jet Mechanical, Inc.  
c/o Martin John Flaton, Jr.  
809 Aldo Ave., Suite 105  
Santa Clara, CA 95054**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on **January 15, 2015**, at San Francisco, California.

/S/

Alicia Rutkowski  
Paralegal